

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR, Plaintiff,

v.

CRAIG S. DONAIS; RUSSELL F. HILLIARD; DONAIS LAW OFFICES, PLLC; UPTON & HATFIELD, LLP; and MARY K. DONAIS, Defendants.

Case No.1:23 -cv-00374-JL

******CONFIDENTIAL AND FILED UNDER LEVEL II SEAL***
[FOR THE JUDGE'S EYES ONLY]***

PLAINTIFF'S EMERGENCY MOTION TO SEAL [LEVEL II]

1. I, the plaintiff, move to seal this motion and the attached documents, pursuant to Fed. Civ. Rule 83(c).
2. I am seeking to seal this motion together with the accompanying document titled
**PLAINTIFF'S EMERGENCY MOTION FOR RECONSIDERATION OF THE
[CONFIDENTIAL] SECOND/FINAL PLAINTIFF'S EMERGENCY MOTION TO
EXTEND DEADLINE TO FILE MOTION TO AMEND COMPLAINT [WITH
AMENDED COMPLAINT]** as well as the attached accompanying Exhibits 1 through 9.
3. The factual and legal basis to justify sealing the filing is based on the fact that this confidential motion contain highly sensitive and confidential medical information, which is presumptively confidential and if disclosed publicly would impair the privacy interests attached thereto. This involves sensitive information involving myself, my spouse and child. NB: This request for sealing is based on the same or similar grounds for sealing that was made in my prior confidential motion to seal filed confidentially, on January 17, 2024, which was granted by the court, and on February 15, 2024, which was in granted in part by the court.
4. If any part of this information is shared with others, it will be harmful to me, my spouse and my family. This information is of the utmost sensitivity and confidentiality as it involves medical and health information pertaining to myself, my spouse and child.
5. Hence, I request that this motion to seal be sealed.

6. I also request that the attached confidential motion be sealed permanently or indefinitely. See Fed. Civ. Rule 83(c).
7. I am seeking to seal the motion to seal, the attached document and all related docket text entries.
8. The filing should be sealed at Level II with the filing, the contents, and docket text entries sealed at Level II to be reviewed only by the judge.
9. WHEREFORE, I, the plaintiff, respectfully request that this Honorable Court grant this Motion to Seal or such further relief as may be deemed just and proper.

Respectfully submitted,

/s/ Andre Bisasor

Andre Bisasor

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February 29, 2024

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served to the defendants in this case.

/s/ Andre Bisasor

Andre Bisasor

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